

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

**MARYANN T. VENECHANOS,**

Debtor

HEMLOCK FARMS COMMUNITY  
ASSOCIATION,

Plaintiff/Creditor

Vs.

MARYANN T. VENECHANOS

Respondent

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CHAPTER

**13**

CASE NO.:

**5:16-bk-02335-RNO**

DOCUMENT:

**44- Amended Ch 13  
Plan**

Honorable Robert N. Opel, II

**OBJECTION OF HEMLOCK FARMS COMMUNITY  
ASSOCIATION TO AMENDED CHAPTER 13 PLAN**

Hemlock Farms Community Association, by its attorneys, Doran & Doran, P.C., John H. Doran, hereby objects to the confirmation of the Debtor's Amended Chapter 13 Plan for the following reasons:

1. Hemlock Farms Community Association has a statutory lien under the Plan Community Act, 68 PA.C.S. Section. 5315 for assessments made against Debtor's property.
2. The amended plan fails to recognize or provide for the claim of Hemlock Farms Community Association.
3. The Plan is vague in failing to provide information in the Plan relative to Debtor's various creditors. The only blanks filled in the Plan relative to creditors and the information contained in that Section B- Administrative claims is not filled in.

WHEREFORE, Hemlock Farms Community Association requests that Confirmation be denied; that the case will be converted to Chapter 7 or dismissed and that the Court should provide such other and further relief as is warranted.

Dated: 11-29-2016

Respectfully submitted:

DORAN & DORAN, P.C.

By: /s/John H. Doran, Esquire

JOHN H. DORAN, ESQUIRE

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**CERTIFICATE OF SERVICE**

AND NOW, I hereby certify that on November 29, 2016, I have served the within Objection to Amended Chapter 13 Plan on the following parties automatically by electronic notice through ECF system:

Charles J. DeHart, III (Trustee)  
dehartstaff@pamd13trustee.com, TWecf@pamd13trustee

Vicki Ann Piontek – Atty for Maryann T. Venechanos  
vicki.piontek@gmail.com

United States Trustee  
ustpreion03.ha.ecf@usdoj.gov

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 11-29-2016

/s/ John H. Doran  
John H. Doran, Esquire